

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

IN RE PHARMACEUTICAL INDUSTRY )	MDL NO. 1456
AVERAGE WHOLESALE PRICE )	
LITIGATION )	CIVIL ACTION: 01-CV-12257-PBS
)	
THIS DOCUMENT RELATES TO: )	JUDGE PATTI B. SARIS
ALL ACTIONS )	
)	

---

**MOTION TO PERMIT BRIAN G. FEDOTIN  
TO APPEAR PRO HAC VICE**

Pursuant to Rule 83.5.3(b) of the Local Rules of this Court, David M. Glynn, a counsel of record for defendants Aventis Pharmaceuticals Inc. hereby moves this Court to permit Brian G. Fedotin to appear on its behalf as counsel *pro hac vice* in the above-captioned action.

In support of this motion, undersigned counsel states the following:

1. The undersigned is a member in good standing of the bar of this Court.
2. Mr. Fedotin is a member in good standing of the bar of Missouri.
3. Mr. Fedotin is a partner at the law firm of Shook, Hardy & Bacon L.L.P.
4. There are no disciplinary proceedings pending against Mr. Fedotin as a member of any bar in any jurisdiction.
5. Mr. Fedotin has indicated in his Certificate attached hereto that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
6. Mr. Fedotin's Certificate in Support Of Motion To Permit Counsel To Appear Pro Hac Vice is attached hereto behind Tab A; a Proposed Order is attached behind Tab B.

Dated: August \_\_\_, 2005

Respectfully submitted,

/s/ David M. Glynn  
**Michael DeMarco (BBO #119960)**  
**[mdemarco@klng.com](mailto:mdemarco@klng.com)**  
**Jeffrey S. King (BBO #559000)**  
**[jking@klng.com](mailto:jking@klng.com)**  
**David M. Glynn (BBO #650964)**  
**[dglynn@klng.com](mailto:dglynn@klng.com)**  
**Cara E. Corbett (BBO #654852)**  
**[ecorbett@klng.com](mailto:ecorbett@klng.com)**  
KIRKPATRICK & LOCKHART  
NICHOLSON GRAHAM LLP  
75 State Street  
Boston, MA 02109-1808  
Telephone: (617) 261-3100